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23 SCOTT ROHLEDER

24 **UNITED STATES DISTRICT COURT**

25 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

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18 UNITED STATES OF AMERICA 19 Plaintiff, 20 21 v. 22 PAUL A. BILZERIAN, et. al, 23 (2) SCOTT ROHLEDER 24 (3) IGNITE INTERNATIONAL 25 BRANDS, LTD. 26 27 28	Case No. 2:24-CR-00569-MEMF Hon. Maame Ewusi-Mensah Frimpong  <b>RENEWED STIPULATION TO CONTINUE HEARING DATE ON DEFENDANTS' MOTION TO DISMISS COUNTS ONE THROUGH SIX OF THE INDICTMENT</b>  Current Hearing Date: June 5, 2025 Requested Hearing Date: July 31, 2025 Trial date: November 3, 2025
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1           Defendants Ignite International Brands, Ltd. (“Ignite”), by and through their  
2 counsel of record, Nina Marino, Moriah Radin and Jennifer Lieser, and Scott  
3 Rohleder (“Rohleder”), by and through their counsel of record, David Schoen and  
4 Simon Schoen, and Plaintiff United States of America, by and through its counsel  
5 of record, Assistant United States Attorneys Alexander B. Schwab, Jason C. Pang,  
6 and Mikaela W. Gilbert-Lurie, hereby agree and stipulate as follows:

7           1. As set forth in the parties’ Stipulation to Continue the Hearing on  
8 Defendants’ Motion to Dismiss (the “Stipulation) filed on May 29, 2025, the  
9 parties wish to continue the hearing on Defendants’ Motion to Dismiss Counts One  
10 Through Six of the Indictment (the “Motion to Dismiss”), Dkt No. 78, from June 5  
11 to July 31, 2025. (Dkt No. 114.)

12           2. On May 30, 2025, this Court denied the parties’ Stipulation because no good  
13 cause was shown for the continuance. (Dkt No. 115.)

14           3. The parties file this Renewed Stipulation to Continue the Hearing Date on  
15 Defendants’ Motion to Dismiss to provide the Court with additional factual  
16 background to support good cause for the requested continuance of the hearing  
17 date.

18           4. The pending Motion to Dismiss was drafted by prior defense counsel and  
19 filed on March 11, 2025. (Dkt No. 78.) Current defense counsel was substituted  
20 into the case in mid-April 2025. (Dkt Nos. 107, 110).

21           5. The government’s discovery in this case consists of approximately 5  
22 terabytes of data. Despite diligent action by both counsel for the government and  
23 defense counsel, defense counsel received the discovery in this matter on or about  
24 May 20, 2025. The discovery has been shipped to defense counsel’s hosting  
25 vendor and is being processed. Given the volume and several technical difficulties,  
26 counsel do not yet have access to the discovery and therefore, have not yet  
27 reviewed it.

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1       6. As the Court is aware, counts two through six in the indictment relate to  
2 transactions and communications involving Ignite and “Company 1” that occurred  
3 from October 2020 through April 2021. (Dkt No. 1, ¶¶ 5-10.) The Motion to  
4 Dismiss contests some of the acts alleged to have occurred, communications that  
5 were made, and the relationship between “Company 1” and Ignite. (See Dkt No. 78  
6 at 18-22.)

7       7. Due to the delay in gaining access to the discovery, current defense counsel  
8 has not had access to the discovery underlying these arguments, including  
9 materials relevant to issues in the Motion to Dismiss. To the extent the Court  
10 expects defense counsel to be able to discuss these materials at the currently  
11 scheduled hearing on the Motion to Dismiss, defense counsel will be unable to do  
12 so.

13       8. Therefore, the parties agree that to provide new counsel with sufficient time  
14 to prepare for the hearing and afford the parties sufficient time to meet and confer,  
15 the hearing on Defendants’ motion to dismiss should be continued until July 31,  
16 2025, at 2:00 p.m.

17       9. Accordingly, the parties file this renewed request that the Court continue the  
18 hearing date on Defendants’ motion to dismiss counts one through six of the  
19 indictment to July 31, 2025, at 2:00 p.m.

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1 IT IS SO STIPULATED.  
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3 DATED: June 1, 2025

Respectfully submitted,

5 /s/ *Nina Marino*

6 NINA MARINO  
7 MORIAH RADIN  
8 JENNIFER LIESER  
9 KAPLAN MARINO, PC

10 Attorneys for Defendant  
11 IGNITE INTERNATIONAL  
12 BRANDS LTD.

13 /s/ *David Schoen*

14 DAVID SCHOEN  
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17 Attorneys for Defendant  
18 SCOTT ROHLEDER

19 DATED: June 1, 2025

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21 United States Attorney  
22 CHRISTINA T. SHAY  
23 Assistant United States Attorney  
24 Chief, Criminal Division

25 /s/ via email authorization

26 JASON C. PANG  
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28 MIKAELA W. GILBERT-LURIE  
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UNITED STATES OF AMERICA